

**Federal Defenders
OF NEW YORK, INC.**

Tamara Giwa
Executive Director

Southern District
52 Duane Street, 10th Floor
New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

Jennifer L. Brown
Attorney-in-Charge

September 26, 2024

By ECF

Honorable Laura Taylor Swain
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States v. George Cole, 24 Cr. 258 (LTS)

Dear Chief Judge Swain:

I write to respectfully request that the Court modify George Cole's bond to permit his travel to the Districts of New Jersey and Connecticut. Pretrial Services consents to this request; the Government takes no position and defers to Pretrial.

Mr. Cole is charged with failing to collect and pay over payroll taxes in 2018–19 under 26 U.S.C. § 7202. He is released on a set of bond conditions including, as relevant, travel restricted to EDNY/SDNY. Mr. Cole, a licensed master rigger, seeks to expand his travel permissions in order to avail himself of work opportunities in New Jersey and Connecticut.

Thank you for your attention to this request.

Respectfully submitted,

/s/ Jonathan Marvinny
Jonathan Marvinny
Assistant Federal Defender
212.417.8792
jonathan_marvinny@fd.org

cc: Jacob H. Gutwillig, Esq.
Evelyn Alvayero, Pretrial Services

The foregoing request is granted. Mr. Cole's bail conditions shall be modified to permit him to travel to the Districts of New Jersey and Connecticut, provided that he give advance notice of any out of district travel to his pretrial services officer. This resolves docket entry no. 18. SO ORDERED.

Dated: September 27, 2024
/s/ Laura Taylor Swain, Chief U.S.D.J.